



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAY 31 2011

Mr. Ramiro Villalvazo
Forest Supervisor
Eldorado National Forest
100 Forni Road
Placerville, California 95667

Subject: Draft Environmental Impact Statement for the Kirkwood Meadows Power Line Reliability Project, Amador, Alpine, and El Dorado Counties, California (CEQ# 20110094)

Dear Mr. Villalvazo:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Kirkwood Meadows Power Line Reliability Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA supports connecting the Kirkwood service area to the existing Pacific Gas & Electric transmission line near Salt Springs Reservoir. The shift from power generated with diesel-fired internal combustion engines to power provided by the grid will greatly reduce diesel particulate matter and greenhouse gas emissions within Kirkwood Valley.

We appreciate the efforts made by the Forest Service and the Kirkwood Meadows Public Utility District--including utilizing existing disturbance corridors to the greatest extent possible, and developing an environmentally preferable alternative in response to concerns raised by the public--to design a project that strives to limit environmental and cultural impacts.

Because the DEIS does not identify the preferred alternative, we have rated each alternative. Based on our review of the DEIS, we have rated the Proposed Action (Alternative 2) and the document as Environmental Concerns – Insufficient Information (EC-2) (see enclosed EPA Rating Definitions). We are concerned about the potential wetlands impacts associated with Alternative 2. Page 297 of the DEIS states that a formal delineation of Waters of the United States was conducted, verified by the Army Corps of Engineers, and “identified 23 federally regulated wetlands located adjacent to or crossed by the proposed project”; however, the nature and extent of impacts to such wetlands is unclear. The FEIS should describe any such impacts and discuss how the project would comply with Section 404 of the Clean Water Act.

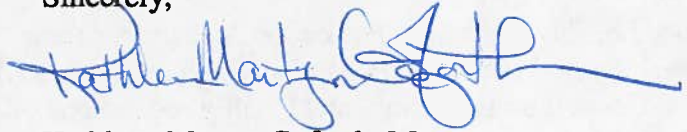
The DEIS states that Alternative 3 was developed, in part, to avoid wetlands impacts. EPA recommends selecting Alternatives 3 and 4, which in combination, are described in the DEIS as the “environmentally superior alternative.” We have rated this combination as Lack of Objections (LO). Together, Alternatives 3 and 4 would avoid significant, permanent adverse impacts to 0.7 mile of the Carson-Mormon Emigrant Trail and temporary impacts to one emergent wetland, and would prevent potential impacts to buried cultural resources at Tragedy Springs Road.

Because it would continue to rely on diesel-fired internal combustion engines, a source of both greenhouse gas emissions and particulate matter, we have rated the No Action Alternative as Environmental Concerns.

We also recommend that the Forest Service describe in the FEIS the potential for the proposed action and the other alternatives to induce growth in Kirkwood Valley. Forest Service staff, in conversations with EPA, indicated that the Kirkwood Meadows transmission line will only support growth that has already been approved by the Kirkwood General Plan. This growth, however, should be treated as an indirect effect of approving the transmission line and evaluated for each alternative in the FEIS.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: CED-2). If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or gerdes.jason@epa.gov.

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

